

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 13
)	
Edgar Contreras,)	Case No. 19-33724
)	
Debtor.)	Judge Jack B. Schmetterer

RESPONSE TO MOTION TO LIFT THE AUTOMATIC STAY

NOW COMES the Debtor, Edgar Contreras, by and through his attorneys Cutler & Associates, Ltd., in for his Response to Motion to Lift the Automatic Stay, states and alleges as follows:

1. Creditor, Gunnison Condominium Association (“Association”) filed its motion for relief from the automatic stay on January 8, 2020.
2. In its motion, the Association alleges that the Debtor is behind in post-petition payments to be made by the Debtor to the Association. The Debtor has cured this default and is current with all post-petition payments to the Association.
3. In its motion, the Association further alleges that the Debtor is behind in pre-petition payments to the Association. In addition, the motion sets forth some of the facts of prior cases and alleges that this is grounds for relief from the stay. However, these facts are merely facts, not grounds for relief. The purpose of the Debtor’s Chapter 13 is to repay the debts owed to the Association and other creditors. This is the purpose of most Chapter 13 bankruptcies. The issues raised by the Association are more in the realm of objections to confirmation, not grounds for relief from the stay.

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CERTIFICATE OF SERVICE

I, David H. Cutler, an attorney, hereby certify that on February 19, 2020, I caused a copy of the Response to be served via the court's electronic noticing system for Registrants on those designated to receive such service as provided on the attached Service List and by U.S. Mail to Non-registrants as provided.

/s/ David H. Cutler

SERVICE LIST

Registrants
(Via CM/ECF)

- Peter C Bastianen ND-Four@il.cslegal.com
- Grant W Simmons ND-Two@il.cslegal.com
- Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov
- Tom Vaughn ecf@tvch13.net, ecfchi@gmail.com
- Andrew A Girard agirard@girardlawgroup.com